

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

Janet Hunt,

Plaintiff,

-against-

Kingsbrook Jewish Medical Center, Inc., et al,

Defendants.

Case No. 1:11-cv-04736-JBW-CLP

NOTICE OF MOTION

PLEASE TAKE NOTICE that upon the accompanying Declaration Barbara E. Hoey with annexed exhibits, Defendants, (incorrectly) named as Kingsbrook Jewish Medical Center, Inc. (“Kingsbrook”), Rutland Nursing Home, Inc. (“Rutland”)¹, Linda Brady, individually and as president and chief executive officer of Kingsbrook Jewish Medical Center and Rutland Nursing Home, and John McKeon, individually and as vice-president of Human Resources at Kingsbrook Jewish Medical Center (collectively, “Defendants”) will move this Court, at the United States District Courthouse for the Eastern District of New York, 225 Cadman Plaza East, Brooklyn, New York 11201, on a date and time to be designated by the Court:

1. For an Order, pursuant to the Court’s February 29, 2012 Order and Rule 26(b) of the Federal Rules of Civil Procedure, to dismiss this action on the grounds that Plaintiff has failed to prosecute this action.

And, further, granting to Defendants their costs, and such other and further relief and the Court may deem just and proper.

¹ The correct name of Defendants is Kingsbrook Jewish Medical Center.

Date: March 15, 2012
New York, New York

LITTLER MENDELSON, P.C.

By: /S/

Barbara E. Hoey, Esq.
Kristen M. O'Connor, Esq.

LITTLER MENDELSON
A Professional Corporation
900 Third Avenue
New York, NY 10022.3298
212.583.9600

Attorneys for Defendants